

MEMO ENDORSED



THE CASAS LAW FIRM  
ATTORNEYS & COUNSELORS

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September 2, 2020

**VIA ECF**

Honorable Kenneth M. Karas  
U.S. District Court, Southern District of New York  
The Hon. Charles L. Breiant Jr.  
Federal Building and U.S. Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

Re: Souza, et al. v. Exotic Island Enterprises, Inc., et al. 18-cv-9448 (KMK)

Dear Judge Karas:

We write on behalf of Plaintiffs to respectfully request that the conference scheduled for September 10<sup>th</sup> at 2:00 p.m. be adjourned *sine die*. Fact discovery has closed (but for a discrete issue about which Magistrate Judge McCarthy has been fully briefed and which is *sub judice*), Plaintiffs' expert disclosures are due September 17<sup>th</sup>, and that same day there is a status conference with Judge McCarthy. Thereafter Defendants' expert disclosures are due, and the parties' experts will be deposed. Considering this, the parties respectfully suggest that adjourning the conference with your Honor until a date after the close of expert discovery would be a preferable use of the Court's time and resources.

To the extent the Court prefers to proceed with the status conference, Plaintiffs respectfully request a brief adjournment until either later in the day on September 10<sup>th</sup>, before noon or after 2:00 p.m. on September 11<sup>th</sup>, or anytime the morning of September 14<sup>th</sup>, as the undersigned has a summary judgment argument at 2:00 p.m. on September 10th

We thank the Court for its attention to these matters.

*Granted. The Court will hold  
a conference on 11/6/2020 at  
11:30 AM*

*SO ORDERED*

*KENNETH M. KARAS U.S.D.J.*

Cc: All counsel of record (via ECF)

Respectfully,

THE CASAS LAW FIRM, P.C.

By: s/ John V. Golaszewski

John V. Golaszewski

*9/3/2020*